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CPM PROJECT

**REVISION OF VOLUNTARY PROTECTION PROGRAM
RE-EVALUATION PROCESS**

By

SHARON DUMIT

**SOUTH CAROLINA DEPARTMENT OF LABOR LICENSING AND
REGULATION**

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Problem Statement

The Voluntary Protection Program, Palmetto Star, is offered by South Carolina Occupational Safety and Health Administration. It is a voluntary program that provides recognition to qualified employers and emphasizes the importance of work site safety and health management systems in meeting the Act "to assure so far as possible every working man and woman in the state safe and healthful working conditions." This emphasis is demonstrated through cooperation among government, labor and management to resolve safety and health problems.¹ South Carolina currently has forty-eight (48) active VPP sites. All sites must go through a re-evaluation process every three years to be approved for continued participation in the Palmetto Star Program. The turn around time on the VPP Re-evaluation report needs to be reduced. This can be accomplished by revising the present Re-evaluation form and establishing written guidelines for the consultants reducing personal interpretation of the VPP Re-evaluation form. Each given year there are approximately eighteen (18) on site re-evaluations scheduled. Each re-evaluation has a team consisting of a team leader, safety consultant, industrial hygienist, resource specialist, and any additional expertise needed for the specific site. Each team member is responsible for specific sections of the Re-evaluation Report and all team members complete section on training for their specific sections. Once the onsite Re-evaluation visit is complete the team members work independently on their sections of the Re-evaluation form. Once the team members finish their sections of the Re-evaluation form it is given to the VPP Coordinator. Once all of the reports are submitted, the VPP Coordinator consolidates all information into one re-evaluation report generated to recommend continued participation in or removal from the Palmetto Star

¹ South Carolina Palmetto Star Voluntary Protection Program Booklet, July 2002

Program. Over the past 3 years the number of VPP approved sites has increased to the point there are multiple re-evaluations conducted per month. The VPP team is made up of safety and health consultants from the Office of OVP. There are currently three (3) health consultants and four (4) safety consultants from which the team is drawn. The team members complete reports at different times. It may be 6-8 weeks before all sections of the report are given to the VPP Coordinator and by this time 2-3 more Re-evaluations may have been conducted. This causes a back log of reports and a delay in approval for continuation and report sent to the VPP site. Currently the Re-evaluation form used by the team members is a 30 page form and is not user friendly. The questions on the form are vague and left to interpretation. The questions are not specific and are interpreted differently by the team members. Each team member uses the entire form to complete their specific sections. This creates one hundred and twenty (120) pages of information to review, consolidate and write one final report which can take up to two (2) weeks. This further delays the report going to the VPP site and increasing the back log of unfinished reports. There have been no set guidelines on how to interpret and complete the Re-evaluation form and no specific deadline for the report submission.

Data Collection

An analysis was conducted on the VPP Re-evaluation Reports written from December 2006 to December 2007. The parameters analyzed were the time frames from on site visit to when each consultant turns in report to the VPP Coordinator, the time it takes to analyze, compile and write the final report, the time it takes to mail the report to the employer. This data was not available through the computer data base but was gathered

by reviewing each report individually by hand. Another data source to analyze is a flow chart of the VPP reevaluation process. This will help identify areas where change would be beneficial. Input from the consultants was gathered through surveys and also small group discussions. Due to the small size of our division, and the fact that all the consultant are field people with minimal time in the office, the small group discussions and surveys were the most effective. The parameters for data collection chosen were based on the flow chart analysis where the consultants had the most control of the report and where time could be utilized more effectively. Also the information pertaining to the VPP Report and the ambiguous questions were causing some time delays with the consultants. Once the onsite visit was complete the consultant had full control of the time frame for report writing and turn in.

Data Analysis

With 18 Re-evaluation visits conducted from December 2006 to December 2007 the time frame for conclusion of the on site visits to the report turned in to the VPP Coordinator varied from 14.2 days to 49 days. This time included the time to write the report to the report turn in. During the consultant interviews, it was said the phrasing of the questions and the work load of ongoing consultation visits, were a factor in turn around time of the VPP re-evaluation report to the VPP Coordinator. There also has not been a VPP re-evaluation report guide established to give the consultants guidance in determining the information needed to be obtained to answer the VPP questions and also a time line for report writing and turn in. There was no priority order established for the VPP Re-evaluation reports and consultation visits. In our last discussion it was agreed

upon, that the consultants would e-mail the progress of the report in 5 working days from onsite visit with any questions they may have concerning the Re-evaluation report. Their completed section of the report would be e-mailed to the VPP Coordinator within 7 working days from date of onsite visit.

Another area of concern is the VPP Re-evaluation format. State Plan States operate under Policies and guidelines set by that individual state rather than follow the federal OSHA guidelines. All federal OSHA states follow the same procedures. The State plans can adopt the Federal VPP regulations and guidelines verbatim or they can adopt certain aspects and amend their own. South Carolina OSHA VPP operates under their own guidelines that include the adoption of some of the Federal policies along with more strict policies written specifically for the South Carolina VPP sites. The VPP Re-evaluation form used for the past eight (8) years had been adopted from the Federal OSHA VPP Policies and Procedures. The Re-evaluation form needs to be more tailored to the specific requirements of the South Carolina VPP policies and procedures. I have contacted other OSHA State Plan States concerning the VPP Re-evaluation form used in their state. I have received responses from four (4) states that operate under similar guidelines as the South Carolina VPP. I am in the process of analyzing the forms to determine if some parts can be utilized in the South Carolina Voluntary Protection Program. If this is not feasible, then a new form will be developed using the South Carolina VPP guidelines.

South Carolina has 48 VPP sites which are comprised of numerous manufacturing facilities, distribution centers, chemical manufacturing facilities, a research center and a health care facility. At the present time one form is to be used to evaluate all the VPP

sites regardless of what they manufacture. A hospital does not operate under the same guidelines as a fabric manufacturer and should be evaluated on the hazard prevention and safety and health programs that are specific to their industry.

At the present time the South Carolina Voluntary Protection Program needs three (3) specific VPP Re-evaluation forms. One form is to be used in manufacturing facilities utilizing all of the standard health and safety programs. The second form is needed for chemical manufacturing facilities that fall under specific guidelines for process safety management (PSM). And the third form is for health care facilities that have safety and health challenges that are unique to the health care industry.

Implementation Plan

After the data analysis, surveys and discussions with consultants, and reviewing other State plans VPP Re-evaluation forms and procedures, the following approaches to improving the South Carolina Voluntary Protection Program Re-evaluation process were evaluated:

1. To establish specific time parameters for the VPP Re-evaluation process.

The first item posed no problems. It was agreed the consultants would e-mail the progress of the report in 5 working days from onsite visit with any questions they may have concerning the Re-evaluation report. Their completed section of the report would be e-mailed to the VPP Coordinator within 7 working days from date of onsite visit. If there is a time delay in submitting the VPP report to the

VPP Coordinator than a detailed explanation will be sent to the VPP Coordinator and the consultant's supervisor will be copied on the memo.

2. To identify the specific VPP forms to be used depending on the industry requirements.

The second item is under review and will take additional time to complete. Information obtained from other state plans is under consideration. All elements of the Voluntary Protection Program have to be addressed including additional information. At the present time I will have an attachment for the chemical facilities that operate under Process Safety Management as well as an amendment for the health care facility. The goal is to have new Re-evaluation reports available prior to the onsite Re-evaluation of the chemical facility and the health care facility scheduled in the fourth quarter of 2008.

3. To separate the VPP Re-evaluation Form into five specific sections. Each consultant will only receive the section they are responsible for. This will eliminate the need to review five entire Re-evaluation forms.

The third item poses no problem and is fairly easy to implement. One week prior to the onsite Re-evaluation a meeting will be held with the Re-evaluation team assigned to the facility. During this meeting a specific section of the Re-evaluation Form will be assigned to each consultant on the team. It will also be requested that the consultants delete any Re-evaluation forms on their

computer prior to the first onsite Re-evaluation meeting of 2008. This will ensure the consultants don't inadvertently use the outdated form.

4. To set up the written procedures for the Re-evaluation process to give the consultants guidelines and timetables for completion of the Re-evaluation forms.

The forth item has not been completed. The first Re-evaluation of 2008 is March 17th. The goal is to have the written procedures and time lines in place prior to our first meeting in March.

5. To conduct a training session for the consultants to explain the procedures and timetables for the Re-evaluation process.

Item number 5 will follow item number 4. Once the written procedures and timelines are completed a training session will be held for the Re-evaluation team members. This will be relatively easy to schedule and complete. With such a small group of team members space is not an issue and the consultants are usually available and at the office on Mondays. The target date for the training session is the end of March 2008.

6. To rewrite the VPP Re-evaluation form to better address the specific areas and to ask more precise questions. This will leave less chance for individual interpretation.

Item number 6 is still in the development stages. I am reviewing the forms received from other State Plan State Voluntary Protection Program Managers.

During this process I will ask for input from the consultants who will be utilizing the Re-evaluation forms. The target date for rewriting the VPP Re-evaluation form is June 2008.

Each of these solutions was looked at for feasibility, ease of implementation and effectiveness.

Implementation

The implementation of the Revision of the Voluntary Protection Program has taken longer than first anticipated. The goal was to have the Re-evaluation form revised by December 2007. Unfortunately that did not happen. The other State Plans contacted took longer than expected to consult with and receive the forms used by their states. The time frame for this revision is estimated to be another 4 to 5 months. The cost of the implementation of the Revision of The Re-evaluation process is minimal. There is no addition equipment needed for the revision.

Evaluation Method

Evaluation of the approaches will be based on the same data collected on the time frames from the on site visit to when each consultant turns in the report to the VPP Coordinator, the time it takes to analyze, compile and write the final report, the time it takes to mail the

report to employer. I will be looking for a decrease in time from date of the onsite visit to when the consultants report section is submitted to the VPP Coordinator and a decrease from time the consultant submits the report to the report being mailed to the employer. The data will be collected quarterly in the 2008 calendar year.

Summary and Recommendations

The changes made in this project should help streamline the South Carolina Voluntary Protection Program Re-evaluation process. This will allow us to give better service in our turn around time to the employers in our Voluntary Protection Program. This will also help the consultants in interpretation of the guidelines and forms therefore reducing time taken to give accurate evaluations of the site. This process will eliminate the need for the consultants to scroll through a 30 page form to find there section to fill out and will also reduce the time the VPP coordinator will take in analyzing and compiling all the information given by the consultants. There will be no need to review five full reports containing thirty pages each when the consultants will now only forward their respective sections. Once the new Re-evaluation forms are finalized and the consultants are trained on the written guidelines I will evaluate the improvements by documenting the time frame from the first on site visit to the report being mailed to the employer. The consultants will be given guidelines that will eliminate any individual interpretation. During the process of this project I realized that there are many steps to a revision that are not evident in the beginning. As you start down the path of dissecting a form several other parameters will come to light and will have to be addressed before moving further into the process. At the time of this report I have been unable to revise the forms due

time constraints and the complexity of the form. I have to be sure not to lessen the criteria by which the employers are evaluated. It may take using a "trial form" along with the original on the next VPP re-evaluation visit to be able to do onsite comparisons. I believe realistically it will be the end of 2008 before the goal of revising the VPP Re-evaluation process will be accomplished. Through this next year I will be able to peel apart the layers of the Re-evaluation process and see where changes can be made on a more detailed level.